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UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)  
 ANTITRUST LITIGATION

Master File Case No. 3:07-cv-05944-SC

MDL No. 1917

This Document Relates to:

Individual Case No. 3:11-cv-06397-SC

*All Indirect Purchaser Actions*

**DECLARATION OF DAVID J. BURMAN IN  
 SUPPORT OF PLAINTIFFS'  
 ADMINISTRATIVE MOTION TO FILE  
 DOCUMENTS UNDER SEAL PURSUANT TO  
 CIVIL LOCAL RULES 7-11 AND 79-5(d)**

*Electrograph Systems, Inc., et al. v. Hitachi,  
 Ltd., et al., No. 3:11-cv-01656-SC*

*Alfred H. Siegel as Trustee of the Circuit  
 City Stores, Inc. Liquidating Trust v.  
 Hitachi, Ltd., et al., No. 3:11-cv-05502-SC*

The Honorable Samuel Conti

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et  
 al., No. 3:11-cv-05513-SC;*

1 *Target Corp, et al. v. Chunghwa Picture*  
2 *Tubes, Ltd., et al.*, No. 3:11-cv-05514-SC

3 *Sears, Roebuck and Co. and Kmart Corp. v.*  
4 *Chunghwa Picture Tubes, Ltd.*, No. 3:11-cv-  
05514-SC

5 *Interbond Corporation of America, d/b/a*  
6 *BrandsMart USA v. Hitachi, et al.*, No. 3:11-  
cv-06275-SC;

7 *Office Depot, Inc. v. Hitachi, Ltd., et al.*, No.  
8 3:11-cv-06276-SC;

9 *CompuCom Systems, Inc. v. Hitachi, Ltd., et*  
10 *al.*, No. 3:11-cv-06396-SC

11 *Costco Wholesale Corporation v. Hitachi,*  
12 *Ltd., et al.*, No. 3:11-cv-06397-SC;

13 *P.C. Richard & Son Long Island*  
14 *Corporation, et al. v. Hitachi, Ltd., et al.*,  
15 No. 3:12-cv-02648-SC;

16 *Schultze Agency Services, LLC on behalf of*  
17 *Tweeter OPCO, LLC and Tweeter Newco,*  
18 *LLC v. Hitachi, Ltd., et al.*, No. 3:12-cv-  
02649-SC;

19 *Tech Data Corporation, et al. v. Hitachi,*  
20 *Ltd., et al.*, No. 3:13-cv-00157-SC

1 I, DAVID J. BURMAN, do testify as follows:

2 1. I am an attorney at the law firm Perkins Coie LLP, counsel of record for Plaintiff  
3 Costco Wholesale Corporation (“Costco”) in this action. This declaration is submitted in support  
4 of Plaintiffs’ Administrative Motion to File Documents Under Seal Pursuant to Civil Local Rules  
5 7-11 and 79-5(d) (the “Motion to Seal”).

6 2. On June 18, 2008, the Court approved a Stipulated Protective Order (Dkt. No. 306)  
7 (“Protective Order”) in this matter.

8 3. Defendants and other parties to this litigation have produced in this action certain  
9 documents and information designated as either “Confidential” or “Highly Confidential” pursuant  
10 to the Stipulated Protective Order.

11 4. On December 23, 2014, in conjunction with the filing of this declaration, Plaintiffs  
12 will file the Motion to Seal, seeking an order to seal the following documents, pursuant to Civil  
13 Local Rules 7-11 and 79-5(d):

- 14 • Plaintiffs’ Opposition to Hitachi Defendants’ Motion for Summary Judgment  
15 Based Upon Withdrawal and the Statute of Limitations; and
- 16 • Exhibits 2-34, 36-40, and 42-55 to the Declaration of David Burman in Support of  
17 Plaintiffs’ Opposition to Hitachi Defendants’ Motion for Summary Judgment  
18 Based Upon Withdrawal and the Statute of Limitations.

19 5. Pursuant to Civil Local Rules 7-11 and 79-5(d), this Court’s General Order No. 62,  
20 Electronic Filing of Documents Under Seal, effective May 10, 2010, and the Protective Order, the  
21 designated portions of the above-referenced documents and redacted portions thereof contain  
22 either: (1) material designated by a Defendant pursuant to a Protective Order as “Confidential” or  
23 “Highly Confidential”; or (b) analysis or, references to, or information taken directly from  
24 material designated by a Defendant pursuant to a Protective Order as “Confidential” or “Highly  
25 Confidential.”

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